

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|  |                         |
|--|-------------------------|
| In re:   | Chapter 11              |
| FRANCHISE GROUP, INC. <i>et al.</i> <sup>1</sup> | Case No. 24-12480 (JTD) |
| Debtors.   | (Jointly Administered)  |

**NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR  
NOTICES OF COMENITY CAPITAL BANK PURSUANT TO  
FED. R. BANKR. P. 2002 AND 9010 AND DEL. BANKR. L.R. 2002-1(d)**

Pursuant to Fed. R. Bankr. P. 2002 and 9010(b) and Del. Bankr. L.R. 2002-1(d), the undersigned counsel enter their appearance for Comenity Capital Bank (“Comenity”), and request that Comenity be added to the official mailing matrix and service lists in these cases and that copies of all pleadings, motions, notices and other papers, filed or served, in these cases or any proceeding therein, be served upon the below-listed counsel at the following mail or e-mail address, or facsimile number:

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

J. Cory Falgowski (No. 4546)  
Burr & Forman LLP  
222 Delaware Avenue, Suite 1030  
Wilmington, DE 19801  
Telephone: (302) 830-2312  
Facsimile: (302) 397-2566  
Email: jfalgowski@burr.com

James H. Haithcock, III  
Burr & Forman LLP  
420 N. 20th Street, Suite 3400  
Birmingham, AL 35203  
Telephone: (205) 458-5277  
Facsimile: (205) 244-5674  
Email: jhaithcock@burr.com

PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, including all amendments to any of the foregoing, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance and Request for Notices nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Comenity's (i) right to have final orders in non-core matters entered only after *de novo* review by a district court; (ii) right to trial by jury in any proceeding so triable in any case, controversy or adversary proceeding; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Comenity is or may be entitled under agreements in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: November 13, 2024

BURR & FORMAN LLP

/s/ J. Cory Falgowski  
J. Cory Falgowski (No. 4546)  
222 Delaware Avenue, Suite 1030  
Wilmington, DE 19801  
Telephone: (302) 830-2312  
jfalgowski@burr.com

*Counsel for Comenity Capital Bank*